

## **Olivero Lora, Sofia**

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**From:** Olivero Lora, Sofia  
**Sent:** Friday, February 12, 2021 10:30 AM  
**To:** Benjamin, Arielle  
**Cc:** Finocchiaro, Marco; Austin, Mark  
**Subject:** Wetland Comments - South Fork Wind

Good morning Arielle,

Thank you for the opportunity to review. Please consider our following comments:

- *Section 4.2.1 of the SFWF – Montauk O&M Facility In-Water Work Assessment of Potential Impacts to Natural Resources from In-Water Work* states that a recent SAV survey has not been completed. It acknowledges that dredging and pile driving activities have the potential to physically damage eelgrass beds or other aquatic vegetation if present within the in-water work area. As is consistent with the requirements of the 404(b)(1) Guidelines, potential impacts to all special aquatic sites must be assessed. EPA recommends a field survey be conducted to identify potential SAV and mudflat impacts at the Montauk O&M facility.
- The Public Notice states that: “No compensatory mitigation is proposed because the disturbance from the installation of the cables and the excavation of sediment from the HDD exit pit would not result in permanent impacts.” However, *Chapter 3: Affected Environment and Environmental Consequences* of the DEIS states that hundreds of acres of benthic habitat will be affected by cable placement and cable protection such as articulated mats and rock coverings. EPA considers fill activities like the placement of protective cable armoring and any discharge on the sea floor to be permanent impacts. EPA recommends that both permanent impacts and temporary impacts to aquatic resources be considered when evaluating and calculating compensatory mitigation, restoration, and monitoring and any conversion of habitat should be mitigated.

Please reach out if you have any questions or want to discuss further.

Sofía

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